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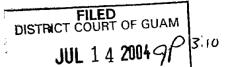
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## The Law Offices of

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MARY L. M. MORAN CLERK OF COURT

(38)

Attorneys for Petitioner

DISTRICT COURT OF GUAM TERRITORY OF GUAM

JULIE BABAUTA SANTOS, et al.,

Petitioners,

**CIVIL CASE NO. 04-00006** 

VS.

FELIX A. CAMACHO, etc., et al.,

Respondents.

STIPULATION OF THE PARTIES
REGARDING ADDITIONAL NOTICES
TO THE CLASS, EXTENDING THE
OBJECTION AND OPT OUT DATE,
AND CONTINUING THE HEARING ON
FINAL APPROVAL OF THE
SETTLEMENT AGREEMENT

The Petitioner, individually and on behalf of all those similarly situated (hereinafter "EIC Class"), through her attorneys of record Phillips and Bordallo, P.C., by Michael F. Phillips, and the Governor of Guam, Director of Department of Revenue and Taxation, Director of Department of Administration, and the GOVERNMENT OF GUAM, (hereinafter collectively referred to as "Government of Guam"), through their attorneys of record, the Office of the Attorney General, by Attorney General Douglas B. Moylan,

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stipulate to the following for purposes of procedures involving the Settlement Agreement:

- 1. Together with this stipulation, Petitioner is filing a Motion with the Court for, among other things, an Order Approving Additional Notice to the Proposed Class Members and for an Order Continuing the Hearing on Final Approval of the Settlement Agreement to November 9, 2004, and Extending the "Objection and Opt Out Date" to October 9, 2004.
- 2. The parties agree that the original notice approved by this Court was not published for the full three weeks in the local newspapers in accordance with the parties agreement as provided in the Settlement Agreement, and in the Stipulated Order Granting Preliminary Approval Class Action Settlement.
- 3. Notwithstanding the failure to fully publish the original notice as agreed, the parties agree that individual notices to members of the class regarding the class action and proposed settlement would be best for all parties involved.
- 4. The parties agree that the Government of Guam, through the cooperation of the Department of Revenue and Taxation, will immediately prepare to send an amended notice approved by this Court to all potential individual members of the Class, all such notices to be distributed through the mail by by August 9, 2004. The amended notice, the form of which is attached as Exhibit "A" to Petitioner's Motion, will also, at the Government of Guam's expense, be published in both local newspapers immediately upon the Court's approval.
- 5. The parties agree, subject to this Court's approval, to continue the hearing on Final Approval of the Settlement Agreement to November 9, 2004, or to such other

date as this Court may order. The parties further agree, subject to this Court's approval, that the "Objection and Opt Out" be extended from the original date of August 9, 2004 to October 8, 2004, or such other date that this Court may order.

Dated July \_\_\_\_, 2004

APPROVED AS TO FORM AND CONTENT:

PHILLIPS & BORDALLO, P.C. Attorneys for Petitioner

Michael F. Phillips

OFFICE OF THE ATTORNEY

**GENERAL** 

Attorneys for Government of Guam